REMARKS

Claims 1-14

Claim 1 is an independent claim, from which claims 2-14 ultimately depend. Claims 1-7 and 11-14 have been rejected under 35 USC 103(a) as being unpatentable over Ezumi (7,197,329). Claims 8-10 have been objected to as containing allowable subject matter, but which ultimately depend from a rejected base independent claim, claim 1. Applicant respectfully submits that as originally presented, claim 1 is patentable over Ezumi. Therefore, claims 2-14 are patentable at least because they depend from a patentable base independent claim, claim 1.

What the claimed invention is limited to, and legal standard for obviousness

Claim 1 recites that each display module of the display comprises "at least one connector displayed in the display module." The at least one connector is "to at least one of receive power from and provide power to a[n] adjacent display module." Applicant submits that these limitations are not suggested in view of Ezumi. Applicant notes that a claimed invention has to be considered "as a whole" (MPEP sec. 2141.02.I.). "Distilling an invention down to the 'gist' or 'thrust' of an invention disregards the requirement of analyzing the subject matter 'as a whole.'" (MPEP sec 2141.02.II., citing W.L. Gore & Associates, Inc. v. Garlock, Inc., 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983)) "All words in a claim must be considered in judging the patentability of that claim against the prior art." (Id., citing In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970))

What Ezumi suggests

Ezumi suggests a wireless telephone system in FIG. 1. The wireless telephone system includes a telephone base station 100 that has a display 101. The telephone base station 100 further has a wire communication line 130 to connect the base station 100 to a telephone line. The telephone base station 100 further includes a corded handset 103. The wireless telephone system of Ezumi itself also includes a cordless handset 110 that has a display 111. The cordless handset 110 wirelessly communicates with the telephone base station 100 via an antenna 113 of the cordless handset 110 and an antenna 104 of the telephone base station 100.

First reason why claimed invention is not suggested in view of Ezumi

First, Applicant notes that claim 1 recites that *each* display module comprises "at least one connector" disposed in the display module. Applicant submits that Ezumi does not suggest *each* display module as having at least one connector, in contradistinction to the claimed invention. The Examiner has identified in Ezumi the wire communication line 130, which connects the telephone base station 100 to a public telephone line (see col. 6, ll. 54-55), as the connector of the telephone base station 100, and thus the connector of the display 101 that corresponds to one of the display modules of claim 1.

However, Ezumi in fact does not suggest that the cordless telephone handset 110/display 111 has a line 130 like the telephone base station 100/display 101 does, such that *each* display module in Ezumi does not have a connector, in contradistinction to the invention. This makes sense, because the purpose of a cordless handset 110 is of course that you do not have to be tethered by a physical wire to make telephone calls. Rather, the idea is that just the base station 100 is physically connected to a telephone line, and the base station 100 wirelessly communicates with the cordless handset 110. In contradistinction to the invention, then, Ezumi suggests that *each* display module does *not* comprise at least one connector; in particular, the display 111 of the

cordless handset 110 does not comprise a connector. Therefore, claim 1 is not *prima facie* obvious and unpatentable over Ezumi for just this reason.

Second reason why claimed invention is not suggested in view of Ezumi

Second Applicant notes that claim 1 recites that the at least connector of each display module is to "at least one of receive power . . . and provide power." Applicant submits that Ezumi does not suggest that the connectors of the display modules not receive power and/or provide power. The Examiner has stated that the wire communication line 130 in Ezumi that connects the telephone base station 100 to a public telephone line receives power because "it is inherent that the wired communication line is plugged into a power source," (office action, p. 3), such that the base station 101/display 101 has a connector (the line 130) that receives power. Applicant disagrees, and notes that the Examiner has not provided any evidentiary support that the wired communication line is plugged into a power source.

Furthermore, even if the communication line 130 is at some point plugged into a power source, this does not mean that the communication line 130 is the mechanism by which the display 101 of the base station 100 "receives power," in contradistinction to the invention. The Examiner did not identify any type of cordless telephone system that relies upon a wired communication line connecting the system to a public telephone line as the mechanism by which the telephone system receives power to power a display of the system. Thus, the Examiner has failed to provide evidence to support his explicit and implicit contentions that (1) the wire communication line 130 is plugged into a power source, and (2) the display 101 of the base station 100 receives power by virtue of the line 130 being plugged into such a power source.

Indeed, every cordless telephone system that Applicant is aware of has both a power connector that plugs into a power outlet, as well as a wired communication line that plugs into a telephone jack. Therefore, it is incorrect to say, because the wired communication line 130 of Ezumi that connects the base station 100 to a telephone line may itself be plugged into a power

source, that this means that the display 101 of the base station 100 receives power via the wired communication line 130. For just this reason, too, claim 1 is not *prima facie* obvious and unpatentable over Ezumi.

Third reason why claimed invention is not suggested in view of Ezumi

First, Applicant notes that claim 1 does not just recite that the connector of a display module is to receive power and/or to provide power, but rather recites that the connector of a display module is to receive power from and/or provide power to *an adjacent display module*. However, as suggested by Ezumi, the wire communications line 130 does not receive power from and/or provide power to *an adjacent display module*, in contradistinction to claim 1. Rather, the wire communications line 130 connects telephone base station 100, including the display 101, to a public telephone line, and not to the other display module as suggested by Ezumi, the cordless telephone handset 110 including the display 111. Therefore, the identified connector of the telephone base station 100 including the display 101 as suggested by Ezumi that corresponds to a display module of claim 1 does not receive power from or provide power to the cordless telephone handset 110 including the display 111 that corresponds to another display module of claim 1, in contradistinction to claim 1. Therefore, claim 1 is not *prima facie* obvious and unpatentable over Ezumi for just this reason, too.

Ezumi teaches away from Examiner's proposed modification of Ezumi

In response to Applicant's arguments, the Examiner has stated that "it is clear that the displays (101, 111) are wirelessly connected through antennas (104, 113), and [one] of ordinary skill in the art would have ascertained [that] the alternate wired connection between the displays (101, 111) is possible through a wired communication line 130 with communication interface (I/F) 210 (see FIG. 2)" (final office action, p. 3). In this respect, the Examiner states that "Ezumi suggests that the use [of] the displays [can be applied] to any other type[] of wireless communication apparatus (col. 11, ll. 3-11)" such that "[c]orrespondingly, it is clear that [an] alternate use of wired type of communication is also possible" (final office action, p. 3).

Applicant disagrees with the Examiner's interpretation and modification of Ezumi in at least two ways. These disagreements are based in the supposition that a claimed invention is not obvious where the prior art *teaches away* from modification to yield the invention. In KSR Int'l Co. v. Teleflex, Inc., 550 US 298 (2007), the Supreme Court has stated that "when the prior art teaches away from combining certain known elements, discovery of a successful means of combining them is likely to be nonobvious" (KSR, slip opinion at 12), referring to its earlier decision United States v. Adams, 383 US 39 (1966). Applicant notes that one type of teaching away is that "[t]he proposed modification cannot render the prior art unsatisfactory for its intended purpose" (In re Gordon, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984)).

First, the Examiner's statement that Ezumi's suggestion that any wireless communication apparatus can be employed means that a wired type of communication is also possible within Ezumi is incorrect. Ezumi does indeed state that any other type of *wireless* communication apparatus can be employed, in column 11, lines 3-11, as stated by the Examiner. However, the Examiner somehow construes this statement to mean that *wired* types of communication can also be employed, since modifying Ezumi to yield the claimed invention requires that the cordless handset 110 be connected in a wired manner to the telephone base station 100. This logical leap by the Examiner is incorrect, though. Ezumi states that it "provide[s] a *wireless* communication

apparatus" (Abstract). Ezumi states that its invention "relates to a wireless communication apparatus" and "a cordless telephone" (col. 1, ll. 9-11).

Thus, if the *cordless* telephone handset of Ezumi is connected in a wired manner to the base station, as suggested by the Examiner, then the telephone handset is no longer *cordless* in any way, and is in fact a *corded* handset. As such, the communications apparatus of FIG. 1 of Ezumi is no longer a *wireless* communications apparatus. Therefore, modifying Ezumi as suggested by the Examiner results in a wireless communications apparatus having a cordless handset that is no longer wireless, and which no longer has a cordless handset! It is telling in this respect that Ezumi states that it is amenable to other types of *wireless* communication, as opposed to, for instance, other types of communications such as *wired* communication, as the Examiner incorrectly suggests.

Indeed, Ezumi *already* has a corded telephone handset 103 connected in a wired manner to the telephone base station 100 in FIG. 1. By connecting the cordless handset 110 to the base station 100 in a wired manner, per the Examiner's suggestion, the base station 100 would have *two* corded handsets and *no* cordless handsets. However, surely a *wireless* communications apparatus has at least *one* cordless handset, and indeed, it does not make any sense to have a telephone with *two* corded handset. For all of these reasons, then, Ezumi teaches away from the Examiner's proposed modification of Ezumi to yield the claimed invention – modifying Ezumi in accordance with the Examiner's suggestion results in a telephone system that is no longer *wireless* (as Ezumi is completely directed to) and no longer has a cordless handset (as is required in a *wireless* telephone system, and also as to which Ezumi is completely directed to).

Second, the Examiner's inclusion of a line interface 210 and a wired communication line 130 within the cordless handset 110 of Ezumi so that the handset 110 can receive power from or provide power to the base station 100 via the base station's corresponding line interface 210 and wired communication line 130 results in the telephone system of Ezumi no longer being satisfactory for its intended purpose, to make and receive telephone calls. Note that the wired

communication line 130 in Ezumi connects the telephone base station 100, including the display 101, to a public telephone line. The way that cordless telephone systems work is that you have a base station that connects to a telephone line (via the wired communication line 130/line interface 210), and this base station then wirelessly transmits the information received over the telephone line to a cordless handset.

Now, the Examiner suggests that you can have a comparable wired communication line 130/line interface 210 within the cordless handset 110, presumably so that there can be a wired line connecting the line interface 210 of the handset with the line interface 210 of the base station 100, via their corresponding communication lines 130. However, connecting the handset 110 with the base station 100 in this way would mean that the line interface 210 of the base station 100 is no longer connected to a telephone line, but is instead connected to the handset 100 to read on the claim language. As such, you have a telephone that cannot make or receive calls, since the telephone is no longer connected to a telephone line! Therefore, Ezumi teaches away from the Examiner's proposed modification of Ezumi to yield the claimed invention, because modifying Ezumi in this manner results in a telephone system that cannot make or receive telephone calls, rendering Ezumi unsatisfactory for its intended purpose.

Claims 15-19

Claims 15-19 have been allowed, for which Applicant thanks the Examiner.

Claims 20-26

Claim 20 is an independent claim, from which claims 21-26 ultimately depend. Claims 20-26 have been rejected under 35 USC 103(a) as being unpatentable over Ezumi in view of Asano (6,636,181). Applicant submits that as originally presented, claim 20 is patentable over Ezumi in view of Asano. Therefore, claims 21-26 are patentable at least because they depend from a patentable base independent claim, claim 20.

Claim 20 recites the following claim language: (1) *each* display module comprising connectors; and, (2) the connectors to receive power from and/or provide power to an adjacent *display module*. This claim language of claim 20 is at least substantially similar to that of claim 1 that has been discussed above. Furthermore, in rejecting claim 20 over Ezumi in view of Asano, the Examiner has relied upon Ezumi in the same way in rejecting claim 1 over Ezumi alone. Insofar as Ezumi does not teach, disclose, or suggest the claim language for which it is being relied upon in the rejection of claim 20 over Ezumi in view of Asano, as has been discussed above in relation to claim 1, then Ezumi in view of Asano does not teach, disclose, or suggest all the claim language of claim 20.[1] This is because *all* the words of claim 20 have to be considered in judging its patentability against the prior art.

Claims 27-37

Claim 27 is an independent claim, from which claims 28-37 ultimately depend. Claims 27-37 have been rejected under 35 USC 103(a) as being unpatentable over Ezumi in view of Asano. Applicant submits that as originally presented, claim 27 is patentable over Ezumi in view of Asano. Therefore, claims 28-37 are patentable at least because they depend from a patentable base independent claim, claim 27.

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[1] Applicant parenthetically notes that the references are not being attacked individually herein. Rather, Applicant's argument is that the proffered combination of references does not teach, disclose, or suggest all the claim language of claim 20, such that the references in combination do not render claim 20 nonobvious. In arguing why the combination of references does not teach, disclose, or suggest all the claim language of claim 20, Applicant focuses on a particular reference, Ezumi, in the same way that the Examiner has done. Insofar as this particular reference does not teach, disclose, or suggest the aspects of claim 20 as relied upon by the Examiner, the combination of references as a whole cannot teach, disclose, or suggest claim 20 in its entirety.

Claim 27 recites the following claim language: the connectors to receive power from and/or provide power to an *adjacent display module*. This claim language of claim 27 is at least substantially similar to that of claim 1 that has been discussed above. Furthermore, in rejecting claim 27 over Ezumi in view of Asano, the Examiner has relied upon Ezumi in the same way in rejecting claim 1 over Ezumi alone. Therefore, insofar as Ezumi does not teach, disclose, or suggest the claim language for which it is being relied upon in the rejection of claim 27 over Ezumi in view of Asano, as has been discussed above in relation to claim 1, then Ezumi in view of Asano does not teach, disclose, or suggest all the claim language of claim 27. This is because *all* the words of claim 27 have to be considered in judging its patentability against the prior art.

Claims 38-50

Claim 38 is an independent claim, from which claims 39-50 ultimately depend. Claims 38-50 have been rejected under 35 USC 103(a) as being unpatentable over Ezumi in view of Asano. Applicant submits that as originally presented, claim 38 is patentable over Ezumi in view of Asano. Therefore, claims 39-50 are patentable at least because they depend from a patentable base independent claim, claim 28.

Claim 38 recites the following claim language: the display modules connectable to one another by connectors to *distribute power among the display modules*. This claim language of claim 38 is similar to that of claim 1 that has been discussed above. Specifically, connectors that distribute power among the display modules as in claim 38 are akin to connectors of the display modules providing power to and/or receiving power from adjacent display modules as in claim 1 for the purposes of the present rejection, because this language of claim 1 provides for the distribution of power as recited in claim 38. In rejecting claim 38 over Ezumi in view of Asano, the Examiner has relied upon Ezumi in the same way in rejecting claim 1 over Ezumi alone. Therefore, insofar as Ezumi does not teach, disclose, or suggest the claim language for which it is being relied upon in the rejection of claim 38 over Ezumi in view of Asano, as has been discussed

above in relation to claim 1, then Ezumi in view of Asano does not teach, disclose, or suggest all the claim language of claim 38. This is because *all* the words of claim 38 have to be considered in judging its patentability against the prior art.

Claim 51

Claim 51 is an independent claim that has been rejected as being unpatentable under 35 USC 103(a) over Ezumi. Applicant respectfully submits that as originally presented, claim 51 is patentable over Ezumi. Claim 51 recites the following claim language: wherein power is distributed among the (interlocking) means. This claim language of claim 51 is similar to the power distribution claim language of claim 38. Therefore, claim 51 is patentable over Ezumi for at least the same reasons that claim 38 is patentable over Ezumi, as has been discussed above in relation to claim 38.

Claims 52-57

Claim 52 is an independent claim, from which claims 53-57 ultimately depend. Claim 52 has been rejected under 35 USC 103(a) as being unpatentable over Ezumi. Claims 53-57 have been rejected under 35 USC 103(a) as being unpatentable over Ezumi in view of Asano. Applicant submits that as originally presented, claim 52 is patentable over Ezumi. Therefore, claims 53-57 are patentable at least because they depend from a patentable base independent claim, claim 52.

Claim 52 has been amended to recite following claim language: *distributing power* among the plurality of interlockable display modules of the display. This claim language of claim 52 is similar to that of claim 38. Therefore, claim 52 is patentable over Ezumi for at least the same reasons that claim 38 is patentable over Ezumi, as has been discussed above in relation to claim 38.

Claims 58-60

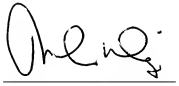
Claim 58 is an independent claim, from which claims 59 and 60 ultimately depend. Claims 58-60 have been rejected under 35 USC 103(a) as being unpatentable over Ezumi in view of Asano. Applicant submits that as originally presented, claim 58 is patentable over Ezumi in view of Asano. Therefore, claims 59 and 60 are patentable at least because they depend from a patentable base independent claim, claim 58.

Claim 58 recites the following claim language: (1) *each* display module comprising connectors; and, (2) the connectors to receive power from and/or provide power to adjacent *display modules*. This claim language of claim 58 is at least substantially similar to that of claim 1 that has been discussed above. Furthermore, in rejecting claim 58 over Ezumi in view of Asano, the Examiner has relied upon Ezumi in the same way in rejecting claim 1 over Ezumi alone. Therefore, insofar as Ezumi does not teach, disclose, or suggest the claim language for which it is being relied upon in the rejection of claim 58 over Ezumi in view of Asano, as has been discussed above in relation to claim 1, then Ezumi in view of Asano does not teach, disclose, or suggest all the claim language of claim 58. This is because *all* the words of claim 58 have to be considered in judging its patentability against the prior art.

Conclusion

Applicants have made a diligent effort to place the pending claims in condition for allowance, and request that they so be allowed. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone Mike Dryja, Applicants' Attorney, at 425-427-5094, so that such issues may be resolved as expeditiously as possible. For these reasons, this application is now considered to be in condition for allowance and such action is earnestly solicited.

Respectfully Submitted,



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